

Kentucky Power Company
KPSC Case No. 2020-00174
Commission Staff's Fifth Set of Data Requests
Dated September 15, 2020

DATA REQUEST

KPSC_5_001 Refer to the application, Exhibit E, page 210 of 216, Tariff E.D.R., which states that the customer will choose the order of the demand discounts at the time of the contract filing. Explain how Kentucky Power will define “at the time of the contract filing.”

RESPONSE

The phrase “at the time of the contract filing” means at the time the contract is executed by the customer and the Company has filed with the Commission.

Witness: Scott E. Bishop

DATA REQUEST

- KPSC_5_002** Refer to Kentucky Power's response to Commission Staff's Third Request for Information (Staff's Third Request), KPCO_R_KPSC_3_1_Attachment27_VaughanWP13.xlsx, Tab ADJ-Calc, and to the application in Case No. 2020-00062.² Footnote 12 on page 10 of the 2020-00062 application states that AEP Kentucky Transmission Company, Inc. (Kentucky Transco) will be installing equipment in conjunction with Kentucky Power that is necessary for the project to be completed.
- a. Explain the decision rules that were applied for how the various components of the project outlined in Case No. 2020-00062 are apportioned between Kentucky Power and Kentucky Transco.
 - b. Explain whether the same rules are and have been applied to past projects for which both Kentucky Power and Kentucky Transco participated jointly.
 - c. For the projected costs in the 2020-00062 application, provide an explanation of how those costs and the amounts attributable to Kentucky Power would be categorized or allocated to the FERC accounts in the Tab ADJ-Calc.
 - d. For the project elements listed in the 2020-00062 application, footnote 12, explain (1) whether Kentucky Transco recovers its capital and other costs through PJM, and if not, (2) explain how it recovers the capital and other costs and how those project element costs attributable to Kentucky Transco would be categorized or allocated to the FERC accounts in the Tab ADJ-Calc.
 - e. For the project elements listed the 2020-00062 application, footnote 12.
 - (1). Explain how the noncapital costs of completing the entire project will be apportioned between Kentucky Power and Kentucky Transco; and
 - (2). Explain how those costs would be categorized or allocated to the FERC accounts listed in Tab ADJ-Calc, if at all.
 - f. Regarding the Affiliated and Non-Affiliated classifications in the FERC accounts listed in Tab ADJ-Calc, explain how the AEP regulated utilities, the AEP Transcos, and any other AEP company would be classified. For example, are the AEP Transcos all Non-Affiliated and regulated AEP operating companies Affiliated?

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g. Refer to Kentucky Power's response to Commission Staff's Fourth Request for Information (Staff's Fourth Request), Items 95.h-i.

- (1). Explain whether the responses mean that Kentucky Transco's project expenses (such as those referenced in 2020-00062) that cannot be allocated to one or more zones are allocated across the AEP zone as NITS Expenses Transco ATRR; and
- (2). Explain whether Kentucky Power's project expenses that cannot be allocated to more than one zone are allocated across the AEP zone through NITS expenses OpCo ATRR.

h. Confirm and explain whether:

- (1). All of the capital expenditures on Kentucky Transco's books are the result of expenditures incurred in conjunction with Kentucky Power transmission related projects as described in Case No. 2020-00062; and
- (2). That Kentucky Transco has not undertaken any project capital expenditures in Kentucky that were independent of and not in conjunction with a Kentucky Power transmission related project.

i. If Kentucky Transco has undertaken projects in Kentucky independently and that were not in conjunction with a Kentucky Power project, provide a listing and description of what projects and project components were and are currently being completed and a detailed description of each project, and whether that project impacts Kentucky Power's operations, if at all.

j. For each and every Kentucky Power project for which Kentucky Transco participated in any way, provide the following:

- (1). The Case Number (if applicable);
- (2). A complete description of the project components;
- (3). What parts were undertaken by Kentucky Power and by Kentucky Transco; and
- (4). The total costs, the capital costs attributable to Kentucky Power and to Kentucky Transco, and which costs are allocated to the FERC accounts making up the OATT expenses allocated back to Kentucky

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Power.

k. For each Kentucky Power project in which Kentucky Transco participated in any way, confirm that but for Kentucky Transco, the entire amount of project expenses would have been on Kentucky Power's books.

l. Refer to Kentucky Power's response to Staff's Third Request, KPCO_R_KPSC_3_1_Attachment27_VaughanWP13.xlsx, Tabs ADJ-Calc and 2020 Rates.

- (1). For accounts 4561005 and 4561002, explain why the test year amounts do not change for the Annualized 2020 Rates.
- (2). For account 5650012, explain how a test-year expense decrease of \$1,140,098 becomes an annualized expense increase of \$8,898,999.
- (3). Explain whether Schedule 12 Expenses (RTEP) amounts are always allocated to account 5650012 only. If not, explain how these expenses are allocated to which FERC accounts.

m. Refer to Kentucky Power's response to Staff's Fourth Request, Item 96, Attachment2.xlsx, Tab 2020. Explain why the Sum of Loads for January 31, 2019 (19,110.444), does not match the AEP (Including CRES) MW amount (19,101) in KPCO_R_KPSC_3_1_Attachment27_VaughanWP13.xlsx, Tab 2020 Rates.

n. Refer to Kentucky Power's response to Staff's Third Request, KPCO_R_KPSC_3_1_Attachment27_VaughanWP13.xlsx, Tabs ADJ-Calc and 2020 Rates. Explain how the FERC account amounts in the Annualize 2020 Rates column in Tab ADJ-Calc would be traced back to Kentucky Power's share of Schedule 12 RTEP, OpCo ATRR, and TransCo ATRR categories in Tab 2020 Rates.

RESPONSE

a. The decisions associated with the scope of work to be performed by Kentucky Power in connection with addressing transmission needs in Kentucky Power's service territory, including the work that is the subject of Case No. 2020-00062, are fact-specific and may vary on a project by project and need by need basis. The Company plans its transmission development in coordination with the AEP transmission organization, within the framework of local, siting, operational, and service requirements, NERC rules, and other

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applicable parameters, as well as PJM's Regional Transmission Expansion Process ("RTEP") planning process. AEPSC and AEP Transmission also have developed project selection guidelines, which are attached as KPCO_R_KPSC_5_2_Attachment1, for use in determining which facilities will be developed by Kentucky Power and which will be developed by AEP Kentucky Transmission Company, Inc. Facilities that qualify to be owned by AEP Kentucky Transmission Company, Inc. are subject to case-by-case evaluation that takes all of the foregoing considerations into account. The project selection guidelines were previously filed as Exhibit LMB-1 to the testimony of Lisa M. Barton in Case No. 2011-00042.

b. Yes, the project selection guidelines attached as KPCO_R_KPSC_5_2_Attachment1 are and have been utilized during the case-by-case and fact-specific analysis described in subpart a above for all projects for which both Kentucky Power and Kentucky Transco participated jointly, including for the Kewanee-Enterprise Park 138 kV Transmission Line Project that is the subject of Case No. 2020-00062.

c. The referenced transmission project in Case No. 2020-00062 is being allocated within the AEP zone and thus will be categorized as NITS.

d. 1) Yes, Kentucky TransCo recovers its annual transmission revenue requirement from PJM. PJM collects that revenue requirement from the LSEs in the transmission zones to which Kentucky TransCo's transmission revenue requirements are allocated. The capital expenditures and operating costs of projects that are forecasted to be in service during the year are included in the annual transmission revenue requirement.

2) Please refer to the Company's response to part d. 1, and part c. The referenced transmission project in Case No. 2020-00062 is not being allocated outside of the AEP Zone and thus will be categorized as NITS.

e. (1). Please refer to the responses to subsections a through d, all of which are applicable to non-capital costs.

2). Please refer to the Company's response to subparts c and d.

f. The AEP Operating Companies and the AEP TransCos are considered affiliates.

g. (1). and (2). The transmission annual charges (cost of service) related to the referenced project will be allocated within the AEP Zone as NITS Expenses Transco ATRR (the portion of which corresponds to Kentucky Transco's projects) and NITS Expenses OpCo ATRR (the portion of which corresponds to Kentucky Power's projects).

h. (1) & (2). Denied. Kentucky Transco's expenditures include projects in conjunction with Kentucky Power, such as that in Case No. 2020-00062, but also include other

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projects which, based on project specifics, can be independent of, or in conjunction with, Kentucky Power projects.

i. As determined by the Commission in Case No. 2011-00042, Kentucky Transco is not subject to the jurisdiction of the Commission. Kentucky Transco's projects are necessary to maintain the reliability of the transmission grid and of Kentucky Transco's and Kentucky Power's transmission systems, in coordination with and within the framework of the PJM RTEP process and other applicable transmission planning parameters. Each project addresses specific needs. Please also refer to the response to subsection (j).

j. (1). Case No. 2018-00209 which was conditionally granted, subsequently cancelled and then replaced with Case No. 2020-00062.

(2) & (3)

For projects for which Kentucky Power required a CPCN before start of construction, please refer to subsection (j)(1). In addition to those projects, Kentucky Power and Kentucky Transco continuously undertake ordinary extensions of existing plant which do not require a CPCN. While at a project execution level these projects are constructed and placed in service on a coordinated and seamless basis, from an accounting and cost recovery point of view Kentucky Transco and Kentucky Power maintain separate books and recover their costs through separate FERC transmission formula rates. Therefore, while information is publicly available about the projects of Kentucky Power and of Kentucky Transco separately from their FERC formula rate filings, Kentucky Power does not distinguish among its transmission projects which ones are done in conjunction with Kentucky Transco and which ones do not involve Kentucky Transco. Similarly, Kentucky Transco does not distinguish among its own projects those which are performed in coordination with Kentucky Power and which are performed only by Kentucky Transco. For additional information about Kentucky Transco projects generally, please refer to Kentucky Transco's publicly available formula rate filings with FERC.

(4)

The recovery of costs associated with the referenced Kentucky Power projects is not affected by whether the project is done in conjunction with a Kentucky Transco project or without the participation of Kentucky Transco. For all projects the costs are recovered through FERC formula rates, which are not distinguished by whether individual projects were performed in conjunction with Kentucky Transco. Please also refer to the Company's response to parts c and d. From the point of view of Kentucky Power's retail cost of service, the costs associated with Kentucky Power's own transmission projects are reflected in the PJM charges to the AEP Zone separately from those associated with Kentucky Transco projects, but in either case no distinction exists between projects done by either entity in coordination with projects of the other, or as independent projects.

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Please also see the Company's response to subsection c., d., and g. as illustrative of how Kentucky Power's retail rates reflect the portion of PJM charges billed to the AEP Zone that reflect the applicable portion the capital expenditures associated with Kentucky Power and with Kentucky Transco projects.

k. The Company cannot speculate about the scope, timing, and costs associated with Kentucky Power transmission projects in which Kentucky Transco has participated if Kentucky Transco had not participated, and therefore the statement in the request cannot be confirmed. Capital constraints are a factor in determining the timing and prioritization of capital projects. It cannot be determined at this point the timing and prioritization of capital projects if Kentucky Power was required to undertake the projects executed by Kentucky Transco since it started operations in Kentucky, or any additional costs resulting from Kentucky Power's greater cost of capital, as compared to Kentucky Transco's, nor the consequences in terms of disruption to reliability or operational requirements resulting from the capital constraints that Kentucky Transco relieves.

l.

1). 4561005 and 4561002 are non firm point to point transmission revenue credits and RTO formation cost recovery respectively. The non firm point to point revenues is a credit back to network transmission customers based on actual revenues from non firm point to point transmission charges. The Company does not have an estimate of what the credit will be so the test year amount was used. The RTO formation costs are an amortization so the same amount of expense is expected going forward as the Company incurred during the test year. Neither account/item is dependent upon the Company's annual transmission formula rate filing updates as are the other FERC accounts included in KPCO_R_KPSC_3_1_Attachment27_VaughanWP13.xlsx, which is the Company's proposed PJM LSE OATT expense adjustment.

2). During the test year the Company received the bulk of the cost allocation settlement credits it is going to receive related to FERC docket EL05-121. During the test year, those credits offset the transmission enhancement expense recorded in 5650012, that will not be the case going forward thus the appearance of a large increase in transmission enhancement expense.

3).For accounts 4561060 and 5650019 Affiliated PJM Transmission Enhancement Costs: Affiliated Transmission Enhancement costs are allocated to Kentucky Power based on annual established 12 coincident peaks ("12CP") applied to the total PJM transmission enhancement charges for all AEP system companies. Every month Kentucky Power's allocated transmission costs are compared to Kentucky Power's transmission enhancement revenue and if Kentucky Power has more transmission enhancement revenue than costs, the transmission enhancement costs are recorded in account 45610060. By recorded the costs in the 45610060 account, it will result in a net revenue

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position for transmission enhancement. Conversely, if in a month, Kentucky Power's allocated transmission costs are compared to Kentucky Power's transmission enhancement revenue and Kentucky Power has more transmission enhancement costs than transmission enhancement revenues, the transmission enhancement costs are recorded in account 45610060 up to the amount of the transmission enhancement revenue with remainder charged to transmission enhancement costs in account 5650019. This would result in reporting a net charge for transmission enhancement costs in the 5650019. The purpose for recording costs this way is to result in only one net position for reporting purposes- either net revenue or net expense.

For account 5650012 PJM Enhancement Charges:

This account records charges from PJM for third party transmission enhancement costs. Third party and affiliated costs are determined based on PJM reported load usage, whether the cost is a result from a third party or an AEP affiliate. This account is allocated to Kentucky Power based on 12 coincident peaks ("12CP").

m. Both numbers are correct. PJM publishes the NSPL figures based on information as of a certain point in time. The AEP 12CP is finalized later and thus is based upon potentially more up to date data. There can be a variance in the two figures but both are correct for the two different allocation processes (PJM NSPL allocation and AEP LSE 12 allocation).

n. Please refer to the 2020 Rates tab which calculates the Company's share of the total zonal revenue requirement by first allocating the revenue requirement to the AEP LSE and the non-AEP LSEs in the zone in rows 4-11. The AEP LSE amount of \$1,689,155,779 in cell H11 is then allocated to the AEP operating companies by 12CP in rows 13-20. The Company's share of total zonal revenue requirement is \$96,896,495 in cell H17. That amount is then carried over to the ADJ-Calc tab in cell D23 and allocated among the various FERC accounts that the expenses will be recorded in in the Annualize 2020 Rates column. The proposed adjustment is then the difference between the amount KPCo will incur in 2020 and what was incurred during the test year.

Witness: Kelly D. Pearce

Witness: Alex E. Vaughan



AEP Transmission LLC (AEPTCo)

Project Selection Guideline

November 19, 2009

REVISION HISTORY

Rev.	Description of Change(s)	Prepared or Revised By	Date	Approved
1				
2				

Note: This document has been prepared by, and is the property of, American Electric Power Company, Inc. This document may be modified by AEP.

AEPTCo Project Selection Guideline

	Responsible Engineers: Kamran Ali Richard Reinaker	Copyright 2009 American Electric Power Company, Inc	Rev. 0	xxxxxx
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DOCUMENT CONTROL

Preparation

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Approved by:	Bernie Pasternack	Managing Director, TASP

Review Cycle

Quarterly	Semi-annual	Annual	As Needed X
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Release

VERSION	DATE RELEASED	FILE NAME	CHANGE NOTICE	REMARKS

Distribution List

NAME(S)	DEPARTMENT	TITLE

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1.0 PURPOSE

This document provides guidance to AEP Transmission personnel in determining how capital will be allocated between the AEP operating companies (“OPCO”) and AEP Transmission Company subsidiaries (“AEPTCo subsidiaries”) regarding the construction of new transmission assets. These guidelines are to be used by employees within the AEP Transmission business unit in determining what Projects or Project Components should be developed by the AEPTCo subsidiaries. All personnel

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participating in the planning, identification and approvals of new AEP Transmission assets must be familiar with and utilize these guidelines.

2.0 ROLES & RESPONSIBILITIES

There are several groups involved with identifying AEP Transmission system needs. The following highlights the roles and responsibilities of the Transmission departments responsible for evaluating system needs:

2.1 Transmission Planning (TP)

- Identify transmission system needs.
- Propose projects and system upgrades.
- Provide recommendations to TAP with respect to development of project or system upgrade.
- Provide detailed information with respect to the need for the given project or system upgrade including Regional Transmission Organization identified projects.

2.2 Transmission Asset Engineering (TAE)

- Identify asset replacement / rehab needs for transmission assets.
- Propose projects and system upgrades.
- Provide recommendations to TAP with respect to development of project or system upgrade.
- Provide detailed information with respect to the need for the given project or system upgrade.

2.3 Transmission Asset Performance (TAP)


- Collect lists of project and system upgrade information from TP and TAE groups.
- Review the detail provided by TP and TAE, and determines whether the project or upgrade meets the requirements of this guideline.
- Prepare documentation necessary for financial approvals and prepare budget projections as requested by Transmission Budgeting Planning & Analysis (TBP&A) group.

3.0 PROJECT SELECTION PROCESS

For the purposes of this document the following definitions apply:

“Assets” are defined as electric equipment, lines, stations that are designated as Transmission pursuant to FERC Form 1 general ledger account.

“Upgrades” are defined as modifications to existing Transmission Assets.

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“Facility” is defined as an entire substation or line between two stations.

“Component” refers to a section or sections of line between two stations and new equipment within a station.

“Project” is defined as a combination of Facilities and Components needed to meet a given system need and included together for financial approval. A Project may include both OPCO and/or AEPTCo assets.


This document has been developed to assist AEP Transmission personnel in determining what Facilities and/or Components should be developed by an AEPTCo subsidiary. Any Facilities or Components that do not meet these guidelines would be developed to the respective AEP Operating Company.

This process recognizes that there may be a need for variances between states, due to state statutory requirements or regulatory precedents. Accordingly, discretion must be exercised by TAP in making such determinations. Known state specific considerations are identified in Appendix A.

3.1 AEPTCo Ownership Eligibility

The following general principles would apply for eligibility as AEPTCo assets:

- Assets that provide a Transmission function (assigned to a Transmission FERC Form 1 general ledger account number) may be eligible for inclusion in an AEPTCo subsidiary if such assets meet the criteria specified in these PSG. No facilities that are classified as Distribution or Generation can be developed by AEPTCo.
 - Transmission Assets designed and operated at voltages of 23 kV or higher in the PJM region and 69 kV or higher in the SPP region are considered Transmission assets. (Currently AEPTCo has no plan to own Texas SPP transmission assets).
 - For a power transformer to qualify as an AEPTCo asset, both primary and secondary transformer voltages must meet the above voltage criteria and the transformer must provide a Transmission function. This restriction does not apply to auxiliary or station service transformers in a station.
 - AEPTCo will build/own only those facilities (Transmission Facilities) that may be recovered from Transmission Service Customers through the RTO's FERC-approved OATT, either through a rate of general applicability or by direct assignment to transmission customers.
 - Transmission assets within a Distribution station that are part of a network qualify as AEPTCo assets.

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3.2 AEPTCo Project Categories

Projects and components that may be developed by an AEPTCo company are categorized as follows:

3.2.1 Greenfield

Greenfield facilities are defined as new transmission assets that do not require replacement or modification of existing facilities or components.

- Development of new transmission Facilities.
- Transmission assets within a new Distribution or Generation station that is part of the transmission network. This would require a clear demarcation between Transmission and Distribution or Generation assets at the facility.
- New property or rights-of-way acquired for new transmission facilities.

3.2.2 Facility Additions


Facility additions are defined as new transmission components installed at existing AEP Operating Company-owned Transmission or Distribution facilities.

- New Transmission equipment additions such as circuit breakers, transformers, shunt or series reactors, capacitor banks, etc. and ancillary equipment directly related to the new Transmission equipment additions.
- May include the retirement of certain existing AEP Operating Company Transmission components, as necessary, to allow for the installation of the new AEPTCo facilities.
- The addition of new AEPTCo line facilities on existing AEP Operating Company towers/poles (e.g. conductors/insulators being installed on vacant tower position).

3.2.3 Facility Replacement

Facility Upgrades are defined as the replacement of an entire existing AEP Operating Company-owned facilities with new AEPTCo-owned facilities.

- Complete replacement of an AEP Operating Company-owned transmission line facility or transmission station facility with a new AEPTCo-owned station or line facility. Retirement of the AEP Operating Company facility is required.
- AEPTCo at cost may lease or purchase the rights-of-way and property easements from the affected AEP Operating Company (consistent with state legal/regulatory requirements).

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3.2.4 Component Replacement

Component replacement is defined as an apportioned replacement of an existing AEP Operating Company-owned Transmission facility or replacement of component(s) within a Transmission facility.

- Major Extra High Voltage (EHV) equipment replacements may be included in AEPTCo.
- All component replacement projects must be evaluated on a case-by-case basis.


3.2.5 Spare/Mobile Equipment

Spare/mobile equipment is defined as purchases of major Transmission equipment as capitalized spares or mobiles.

- Mobile transformers must have Transmission operating voltages at the high and low side for this category.
- Major spare equipment such as transformers and circuit breakers may be purchased to support existing AEPTCo assets.

3.3 Other Considerations

- All assets owned by AEPTCo subsidiaries must be clearly distinguishable from assets owned by AEP Operating Companies.
- Components developed by AEPTCo are intended to be large projects that are readily identifiable and discernable to AEP Service employees and personnel.
- A project should be greater than \$500,000 to be considered for development by an AEPTCo subsidiary. Exceptions to this assumption must be approved by TAP.
- Reimbursable projects or projects involving contributions in aid of construction (CIAC) should follow the guideline for determination of AEPTCo versus AEP Operating Company ownership.
- Projects that have not yet been placed in service but have been previously approved through the AEP financial approval process may be considered for AEPTCo on a case-by-case basis. This provision is transitional and shall self terminate after January 01, 2011.
- Projects or components that require upgrades to AEPTCo facilities or are directly interconnected to AEPTCo facilities shall be developed by AEPTCo.

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3.4 Records Management


- Accounting procedures will comply with all regulatory, GAAP, and FERC Uniform System of Accounts standards.
- Internal controls will be designed to meet AEP standards.
- Assets owned by applicable AEPTCo subsidiary or AEP Operating Company do not change the applicable RTO definition of Transmission or Distribution.
- FERC accounting designations distinguishing Transmission and Distribution equipment must be adhered to in all situations.

3.5 Financial Authorization & Documentation

- Authorization for funding must utilize the same process for both AEPTCo and Operating Company assets.
- TAP shall prepare and route all projects for financial approval, clearly specifying which assets will be owned and operated by AEPTCo. Individual project approvals may include approvals of both Operating Company and AEPTCo assets, as long as all work associated with the project is clearly discernable between the Operating Company and AEPTCo.

3.6 Related Procedures & Guidelines

- Not applicable.

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DATA REQUEST

KPSC_5_003 Refer to Kentucky Power's response to Staff's Fourth Request, Item 3. Explain how the customer is notified if an additional or subsequent deposit is charged.

RESPONSE

At least one month before an additional or subsequent deposit is charged, a customer is notified via the customer's bill in the "Notes From KPCO" section with the following message:

Deposit Warning - A deposit will be billed to your account if all of the above amounts are not paid by the specified dates listed above. Any future late payments may result in a deposit equal to an average 2 months billing being billed to your account.

Should the customer be billed an additional or subsequent deposit, a billing line item would appear on the customer's bill with the following text: "Installment Of A Required \$XX Deposit."

Witness: Scott E. Bishop

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DATA REQUEST

KPSC_5_004 Refer to Kentucky Power's response to Staff's Fourth Request, Item 6, which discusses how Kentucky Power will recover costs from a city or town that requests or requires the installation of underground facilities.

- a. If Kentucky Power's preferred method of recovery is billing the city or town upfront for the cost differential, explain why Kentucky Power cannot just recover the cost from the city or town over a period of time instead of adding it to the bills of the residents of the city or town when a city or town is not able to pay the costs upfront.
- b. If the costs are negotiated to be paid over an amount of time, provide the carrying charge Kentucky Power will charge.

RESPONSE

- a. The language was proposed to the tariff as a means for the Company to collect on required work if the city was unable to pay for the work. The Company could create payment arrangements with cities as proposed by Commission Staff (which would be similar to those already used for Commercial customers) rather than as a franchise fee billing line item if that is what the Commission would prefer.
- b. The Company would not impose a carrying charge in this instance.

Witness: Scott E. Bishop

DATA REQUEST

KPSC_5_005 Refer to Kentucky Power's response to Staff's Fourth Request, Item 13.

- a. Refer to KPCO_R_KPSC_4_13_Attachment1.xlsx. Provide support for estimated installed cost and maintenance cost for each light option.
- b. Refer to KPCO_R_KPSC_4_13_Attachment2.xlsx.
 1. Refer to the support for the monthly maintenance charge amounts of the flexible lighting option under Tariff SL. The support provided appears to show an average monthly maintenance cost of \$2.52, yet Kentucky Power is only proposing a monthly maintenance charge of \$2.23. Explain why Kentucky Power is proposing an amount lower than the average monthly maintenance cost.
 2. Provide support for the estimated installed cost, maintenance cost, and removal cost for each light option.

RESPONSE

a. Please refer to KPCO_R_KPSC_5_5_Attachment1 for the calculations supporting the Company's proposed LED OL options. During the course of discovery, the Company identified some items that were inadvertently excluded from or included in the installed cost estimates for each OL LED option. The corrected calculations and a comparison to the Company's originally filed calculations are included in KPCO_R_KPSC_5_5_Attachment1.

The estimated installed fixture costs are from the manufacturer, the maintenance cost estimates are based on component cost estimates and calculations included in KPCO_R_KPSC_5_5_Attachment1. The removal cost is also a component cost estimate.

b.

1) The \$2.23 is a reasonable estimate but the Company would agree to revise that figure to \$2.52 for monthly maintenance of the flexible lighting option included in Tariff SL.

2) The estimated installed fixture costs are from the manufacturer, the maintenance cost estimates are based on component cost estimates and calculations included in

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KPCO_R_KPSC_4_13_Attachment2. The removal cost is also a component cost estimate.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_006 Refer to Kentucky Power's response to Staff's Fourth Request, Item 15.

- a. For the past three calendar years, provide the commitment status for each of Kentucky Power's generating units each day.
- b. For the past three calendar years, provide the number of days each Kentucky Power resource was offered in and selected in the day-ahead market. Also, provide the number of days by unit.
- c. For the past three calendar years, provide the number of days each Kentucky Power resource was offered in and not selected in the day-ahead market. Also, provide the number of days by unit.
- d. For the past three calendar years, provide the number of days each Kentucky Power resource was offered in and not selected in the day-ahead market, but Kentucky Power nevertheless subsequently self-scheduled the resource. Also, provide the number of days by unit.

RESPONSE

Please see KPCO_R_KPSC_5_6_ConfidentialAttachment1 for the requested information for all parts of this question. Note that the selection of Kentucky Power's units in the Day Ahead market is made on an hourly basis and thus the responses to parts b, c and d are presented in hours, not days.

Witness: Alex E. Vaughan

KPCO_R_KPSC_5_6_PublicAttachment1 has been redacted in its entirety.

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DATA REQUEST

KPSC_5_007 Refer to Kentucky Power's response to Staff's Fourth Request, Item 15(b). Provide the number of days Kentucky Power self-scheduled its units and made off system sales. For each instance, provide the details of the transaction, including, but not limited to, the counter-party, the price sold, and the cost to produce and transmit the energy. Any response should also explain the reasoning for the Company's decision to self-schedule, and separately, to conduct off system sales.

RESPONSE

The Company identified the days it self-scheduled its units in its response to Staff 5-6. For those hours, the Company has provided the energy amount, revenues, average price and cost of the total sales made in each hour the unit was self-committed and provided it with this response as KPCO_R_KPSC_5_7_ConfidentialAttachment1. The attachment reflects transactions in both the Day Ahead and Real Time markets in PJM.

AEPS Commercial Operations generally decides to self-schedule a unit for reasons that may include economic gains in a longer period that would offset potential shorter term losses, managing fuel inventories within contractual constraints, for safety reasons as well as for safety testing or reliability requirements.

Witness: Alex E. Vaughan

KPCO_R_KPSC_5_7_PublicAttachment1 has been redacted in its entirety.

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DATA REQUEST

KPSC_5_008 Refer to Kentucky Power's response to Staff's Fourth Request, Item 15(c), which states that "the Company . . . sells into PJM all of its scheduled generation resources" and that "the Company performs an hourly economic dispatch analysis where the lowest cost resources are used to service internal load customers." Confirm that Kentucky Power's response is predicated on its resource(s) being at or below the security-constrained marginal market price, or LMP. If not confirmed, explain to what degree and how often Kentucky Power dispatches its own units to serve native load at a marginal cost above the price at which Kentucky Power could buy from PJM at prevailing LMP.

RESPONSE

Kentucky Power cannot provide the requested confirmation. Kentucky Power's response, as well as the hourly economic dispatch identified in its response to KPSC 4-15(c), is predicated on its units delivering power to the Day Ahead and Real Time energy markets. Kentucky Power's units are dispatched under a range of circumstances identified in the Company's response to question KPSC 5-6 .

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_009 Refer to Kentucky Power's response to Staff's Fourth Request, Item 16, which discusses the deletion of the Monthly Billing Demand and Monthly Billing Energy sections of Kentucky Power's Non-Utility Generator Tariff.

- a. Explain whether Kentucky Power would still propose deleting these two sections if it were not deleting the provisions for Startup Power Service.
- b. Confirm that the removal of these sections would have no effect on the billing of customers taking service under the Non-Utility Generator Tariff. If not confirmed, explain why not.

RESPONSE

- a. Yes, it would.
- b. Confirmed.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_010 Refer to Kentucky Power's response to Staff's Fourth Request, Item 23. With respect to the demand and energy allocation factors, the Excel attachments illustrate that the factors are indeed the same for jurisdictional and non-jurisdictional sales. Provide the demand and energy allocations for poles, transformers, and conductors for the 2017 and 2020 cost of service studies, and if not the same, explain the differences.

RESPONSE

All demand and energy allocation factors remained the same for jurisdictional and non-jurisdictional sales. In regards to poles, transformers and conductors, Distribution Plant is directly assigned in the Jurisdictional Cost of Service. Transmission Plant resulted in the same allocator as used in the previous base case.

Witness: Jaclyn N. Cost

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DATA REQUEST

KPSC_5_011 Refer to Kentucky Power's response to Staff's Fourth Request, Item 29. Provide a breakout of the \$19.5 million in net revenue that can be attributed to each of the residential, commercial, and industrial customer classes.

RESPONSE

Please refer to KPCO_R_KPSC_5_11_Attachment1 for the requested information.

Witness: Alex E. Vaughan

DATA REQUEST

KPSC_5_012 Refer to Kentucky Power's response to Staff's Fourth Request, Items 35 and 39. Kentucky Power's answers are unresponsive. Even though Value Line Investment Survey (Value Line) may classify all the proxy group companies as electric utilities, there are large differences between each of the companies and with Kentucky Power both in terms of revenues and lines of business. Kentucky Power is not a regulated combination electric and gas company, is not involved with natural gas storage or distribution or gas liquids exploration or pipeline transportation; it does not own nuclear generation, it has no non-regulated lines of business, and it has no foreign operations. All of these other lines of business present risks that are not applicable to Kentucky Power and that serve to differentiate these companies from Kentucky Power.

- a. For each company in the proxy group, provide the total revenue from operations for 2019 as well as the amount and percentage of 2019 revenue derived from regulated electric utility U.S. operations, non-regulated U.S. operations, and foreign operations.
- b. Provide an updated proxy group after the elimination of regulated combination gas and electric companies.
- c. Explain Value Line's criteria for categorizing a company as an electric utility.
- d. Explain the threshold of a company's non-regulated electric utility operations would be such that it would preclude it from being classified as an electric utility by Value Line.

RESPONSE

Kentucky Power disagrees with the premise of this question, which (1) suggests that Kentucky Power's responses to Staff's Fourth Request, items 35 and 39, were unresponsive, and (2) wrongly implies that individual company attributes (e.g., revenue composition, business lines, generating resources) necessarily demonstrate differences in investors' risk perceptions that "differentiate these companies from Kentucky Power."

Company Witness McKenzie's direct testimony at pages 38-42 contains an extensive discussion of the relative risk pertaining to his proxy group of electric utilities. As Mr. McKenzie explains, his identification of a proxy group of risk-comparable electric utilities focuses primarily on credit ratings, which provide an objective indicator of investment risk that considers the key risk factors relevant to investors, including

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quantitative and qualitative factors. As the Managing Director for Moody's Global Regulatory Affairs noted in comments to the Securities and Exchange Commission:

To meet market needs over time, credit ratings have developed important attributes including insightful, robust and independent analysis, symbols that succinctly communicate opinions, and broad coverage across markets, industries and asset classes. These attributes have enabled credit ratings to serve as a point of reference and common language of credit that is used by financial market professionals worldwide to compare credit risk across jurisdictions, industries and asset classes, thereby facilitating the efficient flow of capital worldwide. Farisa Zarin, *Letter Re: Credit Rating Standardization Study – Release No. 34-63573; File No. 4-622* (Feb. 18, 2011).

<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=5&cad=rja&uact=8&ved=0ahUKEwjM7uicuMrbAhUGRqwKHeY0BGkQFghJMAQ&url=https%3A%2F%2Fwww.sec.gov%2Fcomments%2F4-622%2F4622-15.pdf&usq=AOvVaw3Lsgo0DWInU17QdvxEuw9v> (last visited Sep. 23, 2020).

A comparison of credit ratings is widely accepted as a means of evaluating the relative risks of utilities for purposes of identifying a proxy group in the context of estimating the cost of equity. For example, the Federal Energy Regulatory Commission has concluded that “corporate credit ratings are a reasonable measure to use to screen for investment risk,” and that “[c]redit ratings are a key consideration in developing a proxy group that is risk-comparable.” *Potomac-Appalachian Transmission Highline, L.L.C.*, 133 FERC ¶ 61,152, at P 63 (2010). FERC has also ruled that the measure of comparable risks afforded a credit rating screen alone is a sufficient test of comparable investment risks. *N. Pass Transmission LLC*, 134 FERC ¶ 61,095 at P 52 & n.70 (2011).

In addition to credit ratings, Mr. McKenzie also examines a number of key metrics (i.e., beta, Value Line Safety Rank, Value Line Financial Strength Rating) that are widely recognized as independent guides to the investment risks associated with common stocks. Moreover, these measures incorporate the impact of a broad spectrum of risks, including business and financial position, relative size, and exposure to company-specific factors. As Mr. McKenzie indicated at page 42 of his direct testimony, these objective measures indicate that the overall investment risks for Kentucky Power are generally comparable to those of the firms in his proxy group. In other words, the evidence examined by Mr. McKenzie disproves the supposition of this question that, “other lines of business present risks that are not applicable to Kentucky Power and that serve to differentiate these companies from Kentucky Power.”

The Supreme Court has recognized that the degree of risk, not the nature of the business, is relevant in evaluating an allowed ROE for a utility. The cost of capital is

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based on the returns that investors could realize by putting their money in other alternatives, and the total capital invested in utility stocks is only the tip of the iceberg of total common stock investment. The simple observation that a firm operates in non-utility businesses says nothing at all about the overall investment risks perceived by investors, which is the very basis for a fair rate of return. Similarly, gas distribution operations are regulated by the states in the same manner as electric operations, and there is no basis to distinguish between revenues from electric and gas utility operations. Regulatory standards governing a fair ROE are based on comparable risk, not the nature of the business.

In fact, as Mr. McKenzie's testimony explains at pages 79-80, returns in the competitive sector of the economy form the very underpinning for utility ROEs because regulation purports to serve as a substitute for the actions of competitive markets. Under the regulatory standards established by *Hope* and *Bluefield*, the salient criterion in establishing a meaningful proxy group to estimate investors' required return is relative risk, not the source of the revenue stream or the nature of the asset base. Moreover, due to differences in business segment definition and reporting between utilities, it is often impossible to accurately apportion financial measures, such as revenues and total assets, between regulated (*e.g.*, electric and gas) and non-regulated sources. As a result, even if one were to ignore the fact that there is no clear link between the nature of a utility's revenues or assets and investors' risk perceptions, it is generally not possible to accurately and consistently apply asset or revenue-based criteria. In fact, other regulators have rebuffed these notions, with FERC specifically rejecting arguments that utilities "should be excluded from the proxy group given the risk factors associated with its unregulated, non-utility business operations." *Bangor Hydro-Elec. Co.*, 117 FERC ¶ 61,129 at PP 19, 26 (2006).

- a. Please refer to the response above. Mr. McKenzie did not compile the requested information in the course of preparing his direct testimony as it was unnecessary to support his analyses and conclusions. Kentucky Power had not prepared the requested analysis prior to this request, as indicated in the Company's response to Staff 4-35, but it is in the process of doing so now. The Company has not yet completed the analysis, but it will supplement this response with the requested study as soon as practicable.
- b. Please refer to the response above. Mr. McKenzie does not agree that it is appropriate to eliminate companies that are engaged in both regulated electric and gas utility operations and he did not compile the requested information in the course of preparing his direct testimony as it was unnecessary to support his analyses and conclusions. Subject to and without waiving the foregoing, the Company states: Of the twenty-three utilities in Mr. McKenzie's Electric Group,

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the following companies are not engaged in regulated natural gas utility operations:

American Electric Power Co.

Evergy, Inc.

NextEra Energy, Inc.

OGE Energy Corp.

- c. Value Line's analytical methods are proprietary and Mr. McKenzie is not aware of any published criteria governing the categorization of companies in its electric utility industry groups.
- d. Please refer to the response to (c), above.

Witness: Adrien M. McKenzie

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DATA REQUEST

KPSC_5_013 Refer to Kentucky Power's response to Staff's Fourth Request, Item 52. Provide an explanation for the Moody's credit downgrade from Baa2 to Baa3.

RESPONSE

Please refer to the Company's response to AG_KIUC_1_79 and the attachments thereto, including the Moody's Credit Opinion dated April 15, 2019 attached as KPCO_R_KIUC_AG_1_79_Attachment4. The decision to downgrade was made by Moody's and not Kentucky Power. The attachment explains the basis for Moody's decision.

Witness: Franz D. Messner

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DATA REQUEST

KPSC_5_014 Refer to Kentucky Power's response to Staff's Fourth Request, Item 67. Confirm or deny that transmission costs are an increasing relative portion of Kentucky Power's operating costs. If confirmed, elaborate on factors driving this change.

RESPONSE

Kentucky Power confirms that transmission costs are a larger portion of the Company's cost of service than they were in its previous base rate case proceeding. All other things being equal, the factors driving the increase in transmission costs are increased transmission investment in the AEP zone by the various transmission owners in the zone and the associated operating expenses that go along with those investments. Also, increased investment in transmission projects in PJM outside of the AEP Zone that receive a PJM footprint-wide allocation can lead to increases in the transmission portion of the Company's cost of service.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_015 Refer to Kentucky Power's response to Staff's Fourth Request, Item 70. The response is non-responsive. Provide the cost of the basic service charge using the same methodology as was used to calculate the basic service charge in Case No. 2017- 00179³ in Exhibit AEV-2.

RESPONSE

Kentucky Power had not prepared the requested analysis prior to this request as indicated in the Company's response to Staff 4-70, but it is in the process of doing so now. The Company has not yet completed the analysis, but it will supplement this response with the requested study as soon as practicable.

Witness: Alex E. Vaughan

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DATA REQUEST

- KPSC_5_016**
1. Refer to Kentucky Power's response to Staff's Fourth Request, Item 75.
 - a. Explain the benefits associated with promoting EV charging during off-peak times.
 - b. Provide any studies or load data that Kentucky Power has collected on EV charging times.

RESPONSE

- a. Promoting EV charging during off-peak times encourages incremental load at times other than the Company's on-peak cost causing hours, which can lead to downward rate pressure, all other things being equal, through an increase in fixed cost contribution.
- b. The Company has not collected EV charging data directly to date, but instead has leveraged peer utility research and data from sources such as the Electric Power Research Institute. If the off-peak programs are approved, the Company will have the ability to collect data on EV charging times specific to its service territory and customers.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_017 Refer to Kentucky Power's response to Staff's Fourth Request, Item 82, KPCO_R_KPSC_4_82_Attachment1.xlsx. Explain why the kWh received can be greater than the kWh delivered.

RESPONSE

This means that the customer's behind the meter generator produced more excess energy in the billing period than the customer consumed from the Company during the billing period at the times when the customer's generator was not meeting its load requirements.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_018

1. Refer to Kentucky Power's response to Staff's Fourth Request for Information, Item 86, which discusses the basis for avoided energy costs. Also, refer to the Commission's June 28, 1984 Order in Case No. 8566.⁴
 - a. On pages 23–24 of the Commission's June 28, 1984 Order in Case No. 8566, regarding avoided energy costs, the Commission stated that "[i]t was generally agreed that avoided energy costs would be equal to the costs of operating the most expensive unit on line in the relevant time period." Explain how using the PJM Locational Marginal Price to set avoided energy costs complies with the Commission's Order in Case No. 8566.
 - b. On page 33 of the Commission's June 28, 1984 Order in Case No.8566, the Commission required each utility "to record and file in a machine readable format 8760 hours of historical system lambdas for its system operation during the previous calendar year. Furthermore to insure a proper interpretation of these lambdas an explanation of events (i.e., retirements, new units, etc.) which may create non-representative situations in the calendar year should be provided by the utility with the lambdas." While Kentucky Power received a deviation from filing these reports in Case No. 8566-A,⁵ the Commission required that Kentucky Power maintain its records so that the reports would be available if the Commission requested them. For each of the previous five calendar years, provide the report of the historical system lambdas for Kentucky Power's system operation.

RESPONSE

- a. In 1984 the Company was part of the AEP control area and was not a member of an RTO. At that time, using the avoided energy costs of the marginal generating unit online for purposes of serving the Company's load in the AEP control area was appropriate. Since 2004, the Company has been a member of the PJM RTO and its marginal/avoided cost of energy is no longer the cost of its marginal generating unit as the Company's generation resources are not dispatched to meet the Company's load requirements, they are dispatched against PJM's LMP prices. The Company's marginal/avoided cost of

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energy is the PJM LMP for the Company's residual load aggregate at which its load settles.

b. Please refer to the Company's response to part a, the PJM LMP for the Company's residual load aggregate is the Company's system lambda. The requested information is attached as KPCO_R_KPSC_5_18_Attachment1.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_019 Refer to Kentucky Power's response to Staff's Fourth Request, Item 87, regarding Kentucky Power's proposal to close its Non-Utility Generator Tariff to new customers. Explain why Kentucky Power being a member of PJM would have an effect on its offering of a Non-Utility Generator Tariff.

RESPONSE

Kentucky Power's membership in PJM and the associated PJM tariffs and operating manuals clarified the ways that net utility generators participate in the wholesale marketplace and the potential impacts of services to net utility generators on the Company. That information combined with the Company's experience since 2001 has shown that there has been no need for the special provisions of Tariff NUG.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_020 Refer to Kentucky Power's response to Staff's Fourth Request, Item 95.1. and Case No. 2020-00062. If capital expenditures are not an input into the FERC approved formula rates of either Kentucky Power or Kentucky Transco, using the project described in Case No. 2020-00062, and if not already answered previously, explain what project expenses will be inputs into the FERC approved formula rates.

RESPONSE

Generally, while capital expenditures during any particular time period are not an input to the formula rates of either Kentucky Power or Kentucky Transco for that same period, the capital expenditures of Kentucky Power and of Kentucky Transco associated with transmission projects are recorded in the books of each entity, respectively, and are recovered through FERC-approved formula rates in subsequent periods when the associated projects are forecast to be in service, subject to true up for each annual period. The inputs to the formula rates of Kentucky Power and of Kentucky Transco are determined by the applicable FERC-approved formula rate protocols. Please also refer to the Company's response to KPSC Staff 5-2. The capital costs associated with the project that is the subject of Case No. 2020-00062 are recorded on the books of Kentucky Power and Kentucky Transco as applicable contemporaneously with the costs being incurred, and will be reported in one or more future projected transmission revenue requirement filings for each entity at FERC at the time that the project is projected to go in service. From a retail rates point of view, the costs associated with the project are expected to be included in NITS charges billed by PJM to the AEP Zone, a portion of which will be allocated to Kentucky Power as a load serving entity.

Witness: Kelly D. Pearce

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_021 Refer to Kentucky Power's response to Staff's Fourth Request for Information, Item 97. Confirm that the response indicates that the Winter and Annual peak demands listed in Kentucky Power's Integrated Resource Plan, Section 6 page 185 of 2268 are non-coincident peak demands and not coincident peak demands.

RESPONSE

The Company is unable to provide the requested confirmation. The referenced peaks in the IRP are the peaks of Kentucky Power Company, they are Kentucky Power Company's peaks at the time of the AEP zone monthly peak. Therefore they are generally non-coincident to the AEP zone monthly peak, but some may be coincident to the AEP zone monthly peaks.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_022 Refer to Kentucky Power's response to Staff's Fourth Request for Information, Item 99, regarding the special coal provisions in Tariff C.S.-I.R.P. Provide a list of the coal accounts that ceased operations while committing to provide interruptible capacity as a PJM capacity resource under the lower, two year contract term and indicate at what point in the term of their contract they ceased operations.

RESPONSE

The list of the coal accounts that ceased operations while committing to provide interruptible capacity as a PJM capacity resource are as follows:

Deane Mining LLC – 2 year contract was approved 8/24/2017 and the account closed 1/20/2020 which is after the 2 year initial term, but no cancel notification was provided by the customer.

McCoy Elkhorn Mining LLC – 2 year contract was approved 7/6/2017 and the account closed 8/20/2019 which is after the 2 year initial term, but no cancel notification was provided by the customer.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_023 Refer to Kentucky Power's response to Staff Fourth Request, Item 101, which discusses the calculation of the Loss Adjustment (Potential Loss Savings) and to Kentucky Power's response to Commission Staff's First Request for Information in Case No. 2017-00179, Item 73, and KPCO_R_KPSC_1_71_Attachment73_AEVWP3_Rate_Design.xlsx. In Case No. 2017-00179, Kentucky Power used the Energy Compound Loss Factor instead of just the Primary Energy Loss amount to calculate the Loss Adjustment (Potential Loss Savings). Explain why the Loss Adjustment (Potential Loss Savings) was calculated differently in the instant proceeding.

RESPONSE

Please refer to the Company's response to Staff 4-101 for the reasoning behind the change in calculation method. It is common practice for the Company to propose refinements and changes to calculations over time as it identifies improvements that can be made to increase accuracy, or to account for items that are out of date or no longer relevant.

Witness: Alex E. Vaughan

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DATA REQUEST

- KPSC_5_024** Refer to Kentucky Power's response to Staff's Fourth Request, Item 102, KPCO_R_KPSC_4_102_ConfidentialAttachment1.xlsx, regarding support for the On- Peak and Off-Peak Avoided Energy Costs (2020-2022 Average). Also, refer to Kentucky Power's response to the Commission's April 28, 2020 Order in Case No. 2020-00134,⁶ Exhibit 1.
- a. Explain the discrepancies between the amounts listed in KPCO_R_KPSC_4_102_ConfidentialAttachment1.xlsx and Exhibit 1 of Kentucky Power's response to the Commission's April 28, 2020 Order in Case No. 2020-00134.
 - b. Provide a narrative explanation of how the amounts in KPCO_R_KPSC_4_102_ConfidentialAttachment1.xlsx were derived, as well as a schedule, in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible, with detailed information showing how the amounts were derived.

RESPONSE

- a. The differences are not discrepancies, they are two different things. KPCO_R_KPSC_4_102_ConfidentialAttachment1 contains forward pricing quotes as was explained in the Company's response to KPSC 4-102. Forward pricing quotes are what another energy market counterparty is willing to sell or buy at over a specified term as of a specified date. The 2020-2025 figures contained in Exhibit 1 to the Company's filing in Case No. 2020-00134 are forecast price estimates from the fundamentals forecast used in the Company's recent integrated resource plan filing. Both are reasonable and similar ways to estimate future avoided energy costs.
- b. Please refer to the Company's response to part a and Staff 4-102. The values used as the avoided cost of energy for Tariff Cogen/SPP and Tariff NMS II in this proceeding were not derived, they are forward pricing quotes as of 5/20/2020. As such, no spreadsheet exists or could be created.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_025 Refer to Kentucky Power's response to Staff's Fourth Request, Item 111, in regards to any changes in assumptions and methods of calculation of the Cogeneration rates between Case No. 2017-00179 and the instant proceeding. Also, refer to Kentucky Power's response to Staff's Fourth Request, Item 1, KPCO_R_KPSC_3_1_Attachment15_VaughanWP1.xlsx and Kentucky Power's response to Commission Staff's First Requests for Information in Case No. 2017-00179, Item 73, KPCO_R_KPSC_1_73_Attachment73_AEVWP3_Rate_Design.xlsx.

- a. Under I. Assumptions, explain why the estimated unit life changed from 30 years in Case No. 2017-00179 to 40 years in the instant proceeding.
- b. Explain the addition of the Capacity Factor of 25 percent in the calculation of Operation & Maintenance Cost per kW (2020 Dollars).

RESPONSE

a&b. The unit life and capacity factor used in the avoided cost pricing for Tariff Cogen SPP are that of the hypothetical combustion turbine (CT) that has been modeled for the Cogen SPP pricing in this case. All of the rate calculation changes in this case related to tariff Cogen SPP are refinements to a dated rate calculation, they are subjective and still produce a reasonable rate. There are many ways to model the next increment of dispatchable generation, all of which are subjective and change over time. The updates proposed in this case reflect that. Various approaches can be reasonable for this purpose. For example, another common method for pricing the hypothetical CT is to simply use PJM's net cost of new entry (net CONE), which is a publicly available figure that represents the estimated non-energy cost of a hypothetical CT addition in various delivery areas of PJM.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_026 Refer to Kentucky Power's response to Staff's Fourth Request, Item 94b, regarding the Fixed Operation and Maintenance Cost Escalation Rate. Also, refer to Kentucky Power's response to Staff's Fourth Request, Item 110, KPCO_R_KPSC_4_110_Attachment1.xlsx. Also, refer to Kentucky Power's response to Commission Staff's First Request for Information in Case No. 2017-00179, Item 73, KPCO_R_KPSC_1_73_Attachment73_AEVWP3_Rate_Design.xlsx.

- a. Explain why Kentucky Power only used 22 years in the instant proceeding in the Calculation of Cost Escalation Rates.
- b. In Case No. 2017-00179, Kentucky Power used the result of the Calculation of Cost Escalation Rates as the Fixed Operation and Maintenance Cost Escalation Rate and Construction Cost Escalation Rate. Explain why Kentucky Power used two percent in the instant proceeding for those amounts instead of the result of the Calculation of Cost Escalation Rates.

RESPONSE

a&b. Please refer to the Company's response to KPSC Staff 5-25.

Witness: Alex E. Vaughan

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DATA REQUEST

KPSC_5_027 Provide the hotel and meal expenses for American Electric Power (AEP) and Kentucky Power employees that Kentucky Power has considered rate case expenses in this proceeding to date.

RESPONSE

See KPCO_R_KPSC_5_27_Attachment1 for the requested information.

Witness: Brian K. West

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DATA REQUEST

KPSC_5_028 State whether Stites and Harbison, PLLC provides Kentucky Power with detailed invoices for services rendered or only time and fee summaries. If detailed invoices are provided to Kentucky Power, provide the most recent invoice for services rendered in relation to this proceeding to date.

RESPONSE

Stites and Harbison, PLLC provides the Company with detailed invoices for services rendered. See KPCO_R_KPSC_5_28_Attachment1 for the requested information.

Witness: Brian K. West

STITES & HARBISON PLLC

ATTORNEYS

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SEPTEMBER 8, 2020

KENTUCKY POWER COMPANY
1645 WINCHESTER AVENUE
ASHLAND, KY 41101

RE: 2020 RATE CASE
AEP LAWPACK MATTER NO. AEP057677

INVOICE NO. 1503146

KE057-200264

TAX ID: XXXXXXXXXX

MRO

TERMS: PAYABLE UPON RECEIPT

PROFESSIONAL SERVICES, for the period ended AUGUST 31, 2020

Fees for legal services rendered in connection with the above captioned matter through AUGUST 31, 2020 and as reflected by the attached summary	\$23,527.00
Additional Services	\$0.00
TOTAL BALANCE DUE	\$23,527.00



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 FRANKFORT, KY 40602-0634
 (502) 223-3477
 Fax (502) 223-4124
 www.stites.com

SEPTEMBER 8, 2020

KENTUCKY POWER COMPANY
 1645 WINCHESTER AVENUE
 ASHLAND, KY 41101

MRO

INVOICE #: 1503146
 OUR REFERENCE #: KB057-200264
 OUR TAX ID #: [REDACTED]

PROFESSIONAL SERVICES THROUGH AUGUST 31, 2020

MATTER NO. KE057-200264 2020 RATE CASE
 AEP LAWPACK MATTER NO. AEP057677

8/4/20	MRO	C300 A106 COMMUNICATE WITH MR. WOHNHAS RE [REDACTED] ISSUE	0.10	\$35.00
8/4/20	MRO	C300 A106 REVIEW AND ADDRESS [REDACTED] ISSUE AT REQUEST OF MS. BLEND AND MS. WHITNEY	0.40	\$140.00
8/4/20	MRO	L190 A106 ADDRESS [REDACTED] ISSUES	0.20	\$70.00
8/5/20	MRO	L190 A106 COMMUNICATE WITH CLIENTS RE COMMISSION [REDACTED] DECISIONS	0.30	\$105.00
8/5/20	MRO	L250 A103 REVISE NOTICE OF FILING AND READ1ST FILE FOR INITIAL PUBLISHED NOTICE	0.40	\$140.00
8/5/20	KMG	L210 A104 REVIEW COMMISSION ORDERS RE [REDACTED]	0.20	NO CHARGE
8/7/20	MRO	L250 A104 REVIEW COMMISSION DECISION GRANTING SIERRA CLUB'S MOTION TO INTERVENE	0.10	\$35.00
8/10/20	MRO	C300 A104 ADDRESS [REDACTED] ISSUE RAISED BY MR. WEST	0.10	\$35.00
8/11/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MS. SCOTT RE COMMISSION DISCOVERY REQUESTS	0.20	\$70.00
8/11/20	MRO	L310 A106 COMMUNICATE WITH CLIENTS RE DATA REQUESTS	0.20	\$70.00
8/12/20	MRO	L310 A106 COMMUNICATE WITH MR. GLADMAN RE WALMART DATA REQUESTS	0.30	\$105.00
8/12/20	MRO	L310 A106 COMMUNICATE WITH CLIENTS RE DATA REQUESTS	0.40	\$140.00
8/14/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSE TO JOINT INTERVENORS 1-48	0.00	\$0.00

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DATE	TYPE	DESCRIPTION	HOURS	AMOUNT
8/14/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES PREPARED BY MS. SCOTT	1.40	\$490.00
8/14/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES PREPARED BY MR. WEST	2.20	\$770.00
8/14/20	MRO	L310 A106 COMMUNICATE WITH MS. SCOTT RE DRAFT DATA REQUEST RESPONSES	0.30	\$105.00
8/14/20	MRO	C300 A104 ADDRESS ISSUES RE OBJECTIONS TO DATA REQUESTS	0.90	\$315.00
8/16/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSE TO KPSC 1-109	0.30	\$105.00
8/17/20	MRO	L310 A104 REVIEW AND COMMENT ON MR. WEST'S RESPONSES TO STAFF'S FOURTH SET OF DATA REQUESTS	1.10	\$385.00
8/17/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES TO JOINT INTERVENORS 35-37	1.40	\$490.00
8/17/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES BY MR. VAUGHAN	1.20	\$420.00
8/17/20	KMG	L310 A106 PARTICIPATE IN TRAINING FOR FILE SHARE SYSTEM FOR RATE CASE DATA REQUEST RESPONSES	0.40	NO CHARGE
8/18/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. WOHNHAS, WEST, AND MS. BLEND TO REVIEW KIUC 1-70	0.40	\$140.00
8/18/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MS. SCOTT RE DRAFT RESPONSE TO KIUC 1-108	0.60	\$210.00
8/18/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MS. SCOTT REVIEW DRAFT RESPONSE TO KIUC 1-8	0.60	\$210.00
8/18/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES TO JOINT INTERVENORS 35-37	0.00	\$0.00
8/18/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. WOLFFRAM, MULTER, MS. KEATON, MS. ELLIOTT, AND MS. BLEND TO REVIEW KIUC 1-70	0.50	\$175.00
8/18/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSE TO KYSEIA 1-13	0.90	\$315.00
8/18/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT DATA REQUEST RESPONSES BY MS. SCOTT AND MR. WEST	1.70	\$595.00
8/18/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES TO JOINT INTERVENORS 1-35 TO 1-37	0.80	\$280.00
8/18/20	MRO	C300 A103 REVIEW DATA REQUESTS AND PREPARE OBJECTIONS	0.80	\$280.00
8/18/20	KMG	C100 A104 REVIEW CASE RECORD FOR ITEMS FOR WHICH THE COMPANY IS SEEKING CONFIDENTIAL TREATMENT	0.30	\$63.00
8/19/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. ROMINE, BISHOP, WOHNHAS, MEHRABAN, WEST, GLADMAN, WOLFFRAM, GARCIA, BLANKENSHIP, MS. SCOTT, MS. BLEND, MS. ALLINSON, MS. RICHARDSON, AND MS. BLEND TO REVIEW DRAFT RESPONSES FOR MS. WISEMAN AND MR. BLANKENSHIP	0.60	\$210.00

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8/19/20	MRO	L310 A107 ADDRESS REQUEST FOR CONFIDENTIAL FILINGS MADE BY COUNSEL FOR WALMART FOLLOWING EXECUTION OF NONDISCLOSURE AGREEMENT	0.20	\$70.00
8/19/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. GLADMAN, WOHNHAS, BELTER, GARCIA, MS. KEATON, AND MS. BLEND TO REVIEW DRAFT RESPONSES BY MS. OSBORNE AND MS. KEATON	0.70	\$245.00
8/19/20	MRO	L310 A106 MULTIPLE COMMUNICATIONS WITH MS. BLEND RE DATA REQUEST ISSUES AND OBJECTIONS	0.30	\$105.00
8/19/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. GLADMAN, BELTER, GARCIA, CASH, SULHAN, WOLFFRAM, WOHNHAS, MS. KEATON, MS. WHITNEY, AND MS. BLEND TO REVIEW MS. WHITNEY'S DRAFT DATA REQUEST RESPONSES	1.20	\$420.00
8/19/20	MRO	L310 A104 REVIEW AND COMMENT ON MS. WISEMAN'S DRAFT RESPONSES	0.50	\$175.00
8/19/20	MRO	L310 A104 REVIEW AND COMMENT ON MS. WHITNEY'S DRAFT RESPONSES	0.40	\$140.00
8/19/20	MRO	L310 A104 REVIEW AND COMMENT ON MS. OSBORNE AND MS. KEATON DRAFT RESPONSES	0.60	\$210.00
8/19/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. GLADMAN, ROMINE, BLANKENSHIP, PHILLIPS, CROCKER, GARCIA, BELL, MEHRABAN, MS. WHITNEY, AND MS. BLEND TO REVIEW DRAFT RESPONSES FOR MESSRS. BLANKENSHIP AND PHILLIPS	2.00	\$700.00
8/19/20	MRO	L310 A104 REVIEW AND COMMENT ON MR. PHILLIPS' DRAFT RESPONSES	0.70	\$245.00
8/19/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES BY MR. BLANKENSHIP	0.80	\$280.00
8/19/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. MEHRABAN, BLANKENSHIP, ROMINE, WEST, GLADMAN, AND MS. BLEND FOR CONTINUING REVIEW OF RESPONSES BY MESSRS. PHILLIPS AND BLANKENSHIP	1.50	\$525.00
8/19/20	KMG	P400 A104 REVIEW AND COMMENT ON RESPONSES TO DATA REQUESTS FROM COMPANY WITNESS WISEMAN	0.50	\$105.00
8/19/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL OF RESPONSES TO DATA REQUESTS OF COMPANY WITNESS WISEMAN	0.70	\$147.00
8/19/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL OF RESPONSES TO DATA REQUESTS OF COMPANY WITNESS KAISER	0.90	\$189.00
8/20/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. WEST, WOHNHAS, MATTISON, AND MS BLEND TO REVIEW DEPRECIATION QUESTIONS	0.50	\$175.00
8/20/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT DATA REQUEST RESPONSES TO KYSEIA DISCOVERY	0.30	\$105.00

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DATE	TYPE	DESCRIPTION	HOURS	AMOUNT
8/20/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. GLADMAN, BISHOP, WOHNHAS, MATTISON, WEST, LUEDTKE, MESSNER, MS. WHITNEY, MS. SCOTT, AND MS. BLEND TO REVIEW DRAFT DATA REQUEST RESPONSES BY MESSRS. MATTISON, BISHOP, AND MS. SCOTT	2.70	\$945.00
8/20/20	MRO	L310 A104 REVIEW AND COMMENT ON MR. MESSNER'S DRAFT RESPONSES	0.40	\$140.00
8/20/20	MRO	L310 A106 MULTIPLE COMMUNICATIONS WITH MS. BLEND RE DRAFT DATA REQUEST RESPONSES	0.30	\$105.00
8/20/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. MESSNER, WEST, BISHOP, GARCIA, VAUGHAN, MS. LUEDTKE, MS. SCOTT, MS. WHITNEY, MS. COST, AND MS. BLEND TO REVIEW MR. MESSNER'S DRAFT RESPONSES	1.00	\$350.00
8/20/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. WEST, GARCIA, GLADMAN, STEGALL, MS. COST, MS. SCOTT, AND MS. BLEND TO REVIEW DRAFT RESPONSES BY MR. STEGALL AND MS. COST	0.70	\$245.00
8/20/20	MRO	L310 A104 REVIEW AND COMMENT ON MR. STEGALL'S DRAFT RESPONSES TO DATA REQUESTS	0.70	\$245.00
8/20/20	MRO	L310 A104 REVIEW AND COMMENT ON MS. COST'S DRAFT RESPONSES TO DATA REQUESTS	0.20	\$70.00
8/20/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MS. SCOTT AND MESSRS. WEST AND BISHOP RE MS. SCOTT'S DRAFT RESPONSES	0.60	\$210.00
8/20/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSE BY MR. MATTISON	0.10	\$35.00
8/20/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES BY MR. WEST	0.30	\$105.00
8/20/20	MRO	C300 A104 ADDRESS ISSUES RE POTENTIAL OBJECTIONS	0.20	\$70.00
8/20/20	MRO	L250 A103 BEGIN DRAFTING READ1ST FILES FOR DISCOVERY RESPONSES AND MOTION FOR CONFIDENTIAL TREATMENT	0.30	\$105.00
8/20/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL RE DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESS MESSNER	1.00	\$210.00
8/20/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL FOR DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESSES STEGALL AND COST	0.70	\$147.00
8/20/20	KMG	P400 A103 REVIEW AND COMMENT ON DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESS WISEMAN	1.10	\$231.00
8/20/20	KMG	P400 A104 REVIEW AND COMMENT ON DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESS BISHOP	0.60	\$126.00

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DATE	ATTORNEY	DESCRIPTION	HOURS	AMOUNT
8/20/20	KMG	P400 A104 REVIEW AND COMMENT ON DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESSES STEGALL AND COST	0.70	\$147.00
8/20/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL RE DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESSES BISHOP, SCOTT, MATTISON, AND WEST	2.80	\$588.00
8/21/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES TO JOINT INTERVENORS DATA REQUESTS	0.60	\$210.00
8/21/20	MRO	L310 A106 CONTINUED TELEPHONE CONFERENCE WITH MESSRS. VAUGHAN, WOHNHAS, BISHOP, GLADMAN, WEST, MS. COST, AND MS. BLEND TO REVIEW MR. VAUGHAN'S DRAFT DATA REQUEST RESPONSES	0.60	\$210.00
8/21/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. GLADMAN, MCKENZIE, AND MS. BLEND TO REVIEW MR. MACKENZIE'S DRAFT RESPONSES	0.40	\$140.00
8/21/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. GLADMAN, VAUGHAN, WOLFFRAM, WOHNHAS, BISHOP, MS. COST, MS. WHITNEY, MS. SCOTT, AND MS. BLEND TO REVIEW MR. VAUGHAN'S DRAFT DATA REQUEST RESPONSES	1.40	\$490.00
8/21/20	MRO	L310 A104 REVIEW AND COMMENT ON MS. SCOTT'S DRAFT RESPONSES	0.30	\$105.00
8/21/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSE TO KPSC 4-56	0.30	\$105.00
8/21/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. GLADMAN, LOCIGNO, MEHRABAN, WOHNHAS, WOLFFRAM, BISHOP, GARCIA, BELL, WEST, BLANKENSHIP, AND MS. BLEND TO REVIEW AMI-RELATED RESPONSES	1.10	\$385.00
8/21/20	MRO	C300 A106 TELEPHONE CONFERENCE WITH MS. SCOTT RE VERIFICATIONS	0.10	\$35.00
8/21/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT RESPONSES TO MISCELLANEOUS STAFF AND JOINT INTERVENOR DATA REQUESTS	0.40	\$140.00
8/21/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MR. WOHNHAS RE DATA REQUEST RESPONSES	0.10	\$35.00
8/21/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. DUFFY, GLADMAN, DUFFY, PEARCE, WOHNHAS, MS. SPEARS, MS. WHITNEY, AND MS. BLEND TO REVIEW MR. PEARCE'S DATA REQUEST RESPONSES	1.00	\$350.00
8/21/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL OF DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESS WISEMAN	0.70	\$147.00
8/21/20	KMG	P400 A104 REVIEW AND COMMENT ON DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESS VAUGHAN	0.50	\$105.00

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8/21/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL RE DRAFT RESPONSES TO DATA REQUESTS OF COMPANY WITNESS VAUGHAN	1.20	\$252.00
8/21/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL RE RESPONSES TO DATA REQUESTS OF COMPANY WITNESS PEARCE	1.00	\$210.00
8/21/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL RE RESPONSES TO DATA REQUESTS OF COMPANY WITNESS MCKENZIE	1.00	\$210.00
8/21/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL RE RESPONSES TO DATA REQUESTS CONCERNING ADVANCED METERING INFRASTRUCTURE	1.00	\$210.00
8/22/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT AMI DATA REQUEST RESPONSES	0.20	\$70.00
8/22/20	MRO	C300 A104 REVIEW ██████████ TO ADDRESS ISSUE RAISED BY MR. VAUGHAN	1.20	\$420.00
8/22/20	MRO	L250 A103 DRAFT AND REVISE READ1ST FILES FOR DATA REQUEST RESPONSES	0.60	\$210.00
8/23/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT DATA REQUEST RESPONSES	0.30	\$105.00
8/24/20	MRO	L250 A103 DRAFT READ1ST FILE FOR SUPPLEMENTAL RESPONSE TO KPSC 3-1	0.10	\$35.00
8/24/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT DATA REQUEST RESPONSES	0.50	\$175.00
8/24/20	MRO	L310 A106 FOLLOW-UP TELEPHONE CONFERENCE WITH MESSRS. WEST, WOLFFRAM, WOHNHAS, BISHOP, GLADMAN, AND MS. BLEND TO REVIEW DRAFT DATA REQUEST RESPONSES	0.40	\$140.00
8/24/20	MRO	L310 A104 REVIEW AND COMMENT ON DRAFT SUPPLEMENTAL RESPONSE TO KPSC 3-1	0.40	\$140.00
8/24/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MESSRS. GLADMAN, WEST, BISHOP, WOHNHAS, WOLFFRAM, MR. MESSNER, MS. LUEDTKE, MS. SCOTT, AND MS. BLEND TO REVIEW DRAFT DISCOVERY RESPONSES	3.00	\$1,050.00
8/24/20	KMG	P400 A103 REVIEW CONFIDENTIAL ATTACHMENTS TO DATA REQUEST RESPONSES AND BEGIN DRAFTING MOTION FOR CONFIDENTIAL TREATMENT	1.00	\$210.00
8/24/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL TO DISCUSS OUTSTANDING RESPONSES TO INTERVENORS' DATA REQUESTS	0.50	\$105.00
8/24/20	KMG	P400 A106 DISCUSS CONFIDENTIAL ATTACHMENTS WITH CHRISTEN BLEND	0.20	\$42.00
8/24/20	KMG	P400 A106 PARTICIPATE IN REVIEW CALL OF OUTSTANDING RESPONSES TO DATA REQUESTS OF SEVERAL INTERVENORS	1.50	\$315.00
8/25/20	MRO	L430 A103 REVIEW AND REVISE DRAFT MOTION FOR CONFIDENTIAL TREATMENT AND SUPPORTING SCHEDULE	0.80	\$280.00

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8/25/20	MRO	L250 A103 REVIEW AND REVISE DRAFT READ1ST FILES FOR DATA REQUEST RESPONSES	0.70	\$245.00
8/25/20	MRO	L250 A103 REVISE READ1ST FILE FOR SUPPLEMENTAL RESPONSE TO KPSC 3-1	0.10	\$35.00
8/25/20	MRO	L310 A106 MULTIPLE COMMUNICATIONS WITH MR. WEST RE DATA REQUESTS	0.20	\$70.00
8/25/20	MRO	L310 A104 FOLLOW-UP REVIEW AND COMMENT ON DRAFT SUPPLEMENTAL RESPONSE TO KPSC 3-1	0.80	\$280.00
8/25/20	MRO	L310 A106 MULTIPLE COMMUNICATIONS WITH MS. SCOTT RE SUPPLEMENTAL RESPONSE TO KPSC 3-1	0.40	\$140.00
8/25/20	KMG	P400 A103 CONTINUE DRAFTING MOTION FOR CONFIDENTIAL TREATMENT AND EXHIBIT TO SAME	3.00	\$630.00
8/26/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MS. BLEND RE INQUIRY BY WALMART REGARDING OBJECTIONS	0.10	\$35.00
8/26/20	MRO	L250 A103 REVISE AND UPDATE READ1ST FILES	0.20	\$70.00
8/26/20	MRO	L310 A106 MULTIPLE COMMUNICATIONS WITH MS. BLEND, MS. SCOTT, AND MESSRS. WEST AND BISHOP RE DRAFT DATA REQUEST RESPONSES	0.30	\$105.00
8/26/20	MRO	L310 A107 TELEPHONE CONFERENCE WITH MS. GRUNDMANN (COUNSEL FOR WALMART) RE OBJECTIONS TO DATA REQUESTS	0.20	\$70.00
8/26/20	MRO	L250 A103 REVISE READ1ST FILE	0.10	\$35.00
8/26/20	KMG	P400 A106 CORRESPOND WITH CHRISTEN BLEND AND LERAH SCOTT RE MOTION FOR CONFIDENTIAL TREATMENT	0.10	\$21.00
8/26/20	KMG	P400 A103 DRAFT NON-DISCLOSURE AGREEMENT FOR KENTUCKY SOLAR INDUSTRIES ASSOCIATION	0.10	\$21.00
8/26/20	KMG	P400 A107 CORRESPOND WITH COUNSEL FOR KENTUCKY SOLAR INDUSTRIES ASSOCIATION RE NON-DISCLOSURE AGREEMENT	0.10	\$21.00
8/27/20	MRO	L190 A106 TELEPHONE CONFERENCE WITH MR. WOHNHAS RE DATA REQUEST PROCESS	0.40	\$140.00
8/27/20	MRO	L310 A106 TELEPHONE CONFERENCE WITH MS. SCOTT RE SUPPLEMENTAL RESPONSES	0.10	\$35.00
8/27/20	MRO	L310 A107 COMMUNICATE WITH COMMISSION STAFF AND INTERVENORS' COUNSEL RE CONFIDENTIAL DOCUMENTS	0.50	\$175.00
8/27/20	MRO	L310 A106 MULTIPLE COMMUNICATIONS WITH MS. SCOTT RE SUPPLEMENTAL RESPONSES	0.20	\$70.00
8/27/20	MRO	L250 A103 DRAFT READ1ST FILE FOR SUPPLEMENTAL RESPONSES	0.10	\$35.00
8/28/20	MRO	L190 A104 ADDRESS ISSUES RE NON-DISCLOSURE AGREEMENT WITH KYSEIA	0.20	\$70.00

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8/28/20	MRO	L310 A106 COMMUNICATE WITH CLIENTS RE ATTORNEY GENERAL'S DATA REQUESTS AND COMMUNICATION FROM MIKE WEST RE SAME	0.10	\$35.00
8/28/20	MRO	L310 A107 COMMUNICATE WITH COUNSEL FOR ATTORNEY GENERAL AND KIUC RE OBJECTIONS	0.10	\$35.00
8/28/20	KMG	P400 A103 REVIEW AND REVISE NON-DISCLOSURE AGREEMENT FOR KYSEIA	0.10	\$21.00
8/28/20	KMG	P400 A107 CORRESPOND WITH COUNSEL FOR KYSEIA RE NON-DISCLOSURE AGREEMENT	0.10	\$21.00
8/31/20	KMG	L210 A108 TELEPHONE CONFERENCES WITH COUNSEL FOR KYSEIA RE CONFIDENTIAL DATA REQUEST RESPONSES	0.30	\$63.00
<i>BALANCE</i>				<i>\$23,527.00</i>

SUBTOTAL	\$23,527.00
PRIOR BALANCE	\$2,418.50
AMOUNT DUE	\$25,945.50

TIME AND FEE SUMMARY

TIMEKEEPER	RATE	HOURS	FEES
MARK R. OVERSTREET	350.00	54.20	\$18,970.00
KATIE GLASS	210.00	21.70	\$4,557.00
TOTALS		75.90	\$23,527.00

PLEASE INCLUDE ON YOUR CHECK OUR REFERENCE NUMBER WHICH APPEARS BELOW THE INVOICE NUMBER ON THIS INVOICE. INVOICES ARE DUE ON RECEIPT.

FILE NUMBER: KE057-200264
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INVOICE DATE: SEPTEMBER 8, 2020

IF PAYMENT IS MADE BY WIRE REMITTANCE, PLEASE DIRECT TO:

STITES & HARBISON
PNC
LOUISVILLE, KY. 40202

PLEASE REFERENCE YOUR MATTER NO. KE057-200264, INVOICE NO. 1503146

VERIFICATION

The undersigned, Scott E. Bishop, being duly sworn, deposes and says he is a Regulatory Consultant Senior for Kentucky Power Company, that he has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

Scott E. Bishop

Scott E. Bishop

COMMONWEALTH OF KENTUCKY

)

) Case No. 2020-00174

COUNTY OF BOYD

)

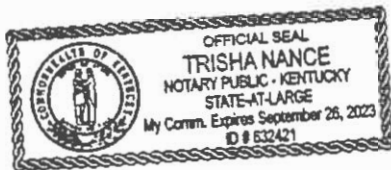
Subscribed and sworn to before me, a Notary Public in and before said County and State, by Scott E. Bishop, this 28 day of September 2020.

Trisha Nance

Notary Public

Notary ID Number: 632421

My Commission Expires: 9-26-2023





KY Discovery Verification - Vaughan.docx

DocVerify ID: 818A33BD-1C6D-431A-BA9E-618C4BEFB95B
Created: September 24, 2020 10:59:49 -8:00
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E-Signature Summary

E-Signature 1: Alex E Vaughan (AEV)

September 24, 2020 12:06:53 -8:00 [695DBC43E413] [167.239.2.88]
aevaughan@aep.com (Principal) (Personally Known)

E-Signature Notary: Brenda Williamson (BW)

September 24, 2020 12:06:53 -8:00 [ABA201A38BF6] [167.239.2.87]
bgwilliamson@aep.com
I, Brenda Williamson, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Alex E. Vaughan, being duly sworn, deposes and says he is a Director-Regulatory Pricing & Renewables for American Electric Power Service Corporation that he has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

Alex E Vaughan
Signed on 2020/09/24 12:06:53 -8:00
Alex E. Vaughan

STATE OF OHIO

)

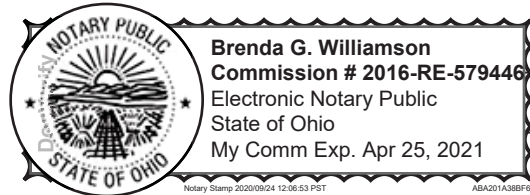
) Case No. 2020-00174

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by
09/24/2020 _____, this ____ day of September, 2020.

Brenda Williamson
Signed on 2020/09/24 12:06:53 -8:00



818A33BD-1C6D-431A-BA9E-618C4BEFB95B --- 2020/09/24 10:59:49 -8:00 --- Remote Notary





Pearce_KY Discovery Verification.docx

DocVerify ID: 1ED8E5E7-C671-47D8-9ABB-AA60F9DA9328
 Created: September 23, 2020 13:17:21 -8:00
 Pages: 1
 Remote Notary: Yes / State: OH

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E-Signature Summary

E-Signature 1: Kelly Pearce (KDP)

September 24, 2020 12:47:17 -8:00 [F3188442B2D1] [24.208.135.157]
 kdpearce@aep.com (Principal) (Personally Known)

E-Signature Notary: Sarah Smithhisler (SRS)

September 24, 2020 12:47:17 -8:00 [B5187B5946CA] [167.239.221.80]
 srsmithhisler@aep.com

I, Sarah Smithhisler, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Kelly D. Pearce, being duly sworn, deposes and says he is a Managing Director of Transmission Asset Strategy and Policy for American Electric Power Service Corporation that he has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

Kelly Pearce
Signed on 2020/09/24 12:47:17 -8:00

Kelly D. Pearce

STATE OF OHIO

)

) Case No. 2020-00174

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Kelly D. Pearce, this 24th day of September 2020.



S. Smithhisler
Signed on 2020/09/24 12:47:17 -8:00

Notary Public

Notary ID Number: 2019-RE-775042

1ED8E5E7-C671-47D8-9ABB-AA60F9DA9328 --- 2020/09/23 13:17:21 -8:00 --- Remote Notary





Cost_KY Discovery Verification.docx

DocVerify ID: 40916978-99C6-4237-907A-3FE250BED37F
Created: September 23, 2020 13:18:09 -8:00
Pages: 1
Remote Notary: Yes / State: OH

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E-Signature Summary

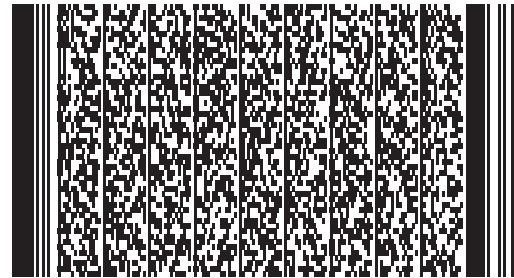
E-Signature 1: Jaclyn Cost (JC)

September 25, 2020 07:32:22 -8:00 [3695A8092BCF] [167.239.2.87]
jncost1@aep.com (Principal) (Personally Known)

E-Signature Notary: Sarah Smithhisler (SRS)

September 25, 2020 07:32:22 -8:00 [0DB46CB56FBE] [167.239.2.88]
srsmithhisler@aep.com

I, Sarah Smithhisler, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Jaclyn N. Cost, being duly sworn, deposes and says she is a Regulatory Consultant Sr. for American Electric Power Service Corporation that she has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of her information, knowledge and belief after reasonable inquiry.

Jaclyn Cost
Signed on 2020/09/25 07:32:22 -8:00

Jaclyn N. Cost

STATE OF OHIO

)

) Case No. 2020-00174

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Jaclyn N. Cost, this 25th day of September 2020.



S. Smithhisler
Signed on 2020/09/25 07:32:22 -8:00

Notary Public

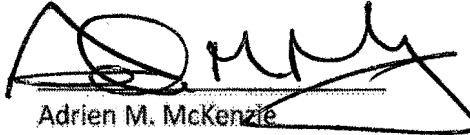
Notary ID Number: 2019-RE-775042

40916978-99C6-4237-907A-3FE250BED37F --- 2020/09/23 13:18:09 -8:00 --- Remote Notary



VERIFICATION

The undersigned, Adrien M. McKenzie, being duly sworn, deposes and says he is the President of FINCAP, Inc., that he has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.


Adrien M. McKenzie

STATE OF TEXAS

)

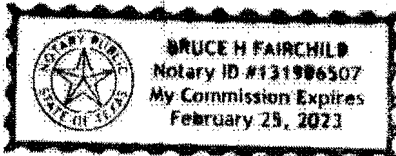
) Case No. 2020-00174

COUNTY OF TRAVIS

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by ADRIEN M. MCKENZIE this 21st day of September 2020.


Notary Public



Notary ID Number: 131906507

My Commission Expires: 2/25/2023



KY Discovery Verification - Messner.docx

DocVerify ID: 349B5B51-2347-494A-B955-741796B703A0
Created: September 25, 2020 07:13:51 -8:00
Pages: 1
Remote Notary: Yes / State: OH

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E-Signature Summary

E-Signature 1: Franz Messner (FDM)

September 25, 2020 07:33:46 -8:00 [55BFA807A74B] [167.239.221.80]
fdmessner@aep.com (Principal) (Personally Known)

E-Signature Notary: Brenda Williamson (BW)

September 25, 2020 07:33:46 -8:00 [CCC9454CFB89] [167.239.221.84]
bgwilliamson@aep.com
I, Brenda Williamson, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and says he is Director Regulatory Services for Kentucky Power Company that he has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.



Brian K. West

COMMONWEALTH OF KENTUCKY

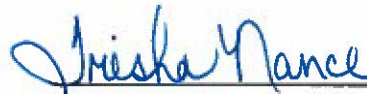
)

) Case No. 2020-00174

COUNTY OF BOYD

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Brian K. West, this 28th day of September, 2020.



Notary Public

Notary ID Number: 632421

My Commission Expires: 9-26-2023

